

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

NATALIE LEE (CABN 277362)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Natalie.Lee2@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 13-0554 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	Date: Dec. 20, 2013
GUILLERMO ESPARZA,)	Time: 9:30 a.m.
Defendant.)	
)	
)	

On November 15, 2013, the parties made an initial status appearance before the Court. During that status appearance, the parties explained to the Court that most of the discovery had been provided to defense counsel, but that defense counsel was awaiting the delivery of additional discovery such as lab and cell phone forensics. Therefore, the parties requested, and the Court ordered, that another status appearance be set for December 20, 2013, at 9:30 a.m. The parties also requested, and the Court ordered, that the time between November 15, 2013 and December 20, 2013, be excluded from the running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for this extension. The parties also agreed that the ends of justice served by granting such a continuance outweighed the best interests of the public and the defendant in a speedy trial. 18

1 U.S.C. § 3161(h)(7)(A).

2 SO STIPULATED:

3
4 MELINDA HAAG
United States Attorney

5
6 DATED: November 15, 2013

7 /S/
NATALIE LEE
Assistant United States Attorney

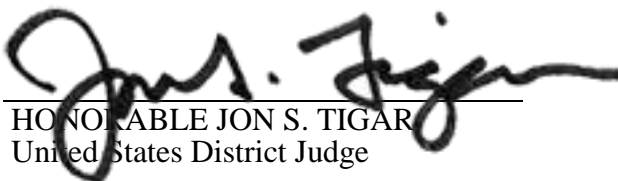
8
9 DATED: November 15, 2013

10 /S/
ELLEN LEONIDA
Attorney for Guillermo Esparza

11 For the reasons stated above, the Court finds that the exclusion of time from November 15, 2013
12 through December 20, 2013 is warranted and that the ends of justice served by the continuance outweigh
13 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A). The
14 failure to grant the requested continuance would deny the defendant effective preparation of counsel and
15 would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

16 SO ORDERED.

17
18 DATE: November 18, 2013

19 
HONORABLE JON S. TIGAR
United States District Judge